

Matthew W. Gissendanner
Senior Counsel
Dominion Energy Services, Inc.

220 Operation Way, MC C222, Cayce, SC 29033
DominionEnergy.com



January 29, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Dominion Energy South Carolina, Incorporated's Establishment of a
Solar Choice Metering Tariff Pursuant to S.C. Code Ann. Section 58-40-
20 (See Docket No. 2019-182-E)
Docket No. 2020-229-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Dominion Energy South Carolina, Inc. ("DESC") is DESC's First Set of Discovery Requests to the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Vote Solar, the Solar Energy Industries Association, and the North Carolina Sustainable Energy Association.

By copy of this letter DESC is providing a copy of these requests to the parties of record and encloses a certificate of service to that effect.

If you have any questions or need anything further, please do not hesitate to contact me.

Very truly yours,


Matthew W. Gissendanner

MWG/kms
Enclosure

cc: Jeffrey M. Nelson, Esquire
Jeffrey W. Kuykendall, Esquire
Jenny R. Pittman, Esquire
Frank Knapp, Jr.

Thadeus B. Culley, Esquire
R. Taylor Speer, Esquire
Katherine Lee Mixson, Esquire
David I. Neal, Esquire

(all via electronic mail only w/enclosures)

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-229-E

Dominion Energy South Carolina, Inc.'s)	DOMINION ENERGY
Establishment of a Solar Choice Metering Tariff)	SOUTH CAROLINA,
Pursuant to S.C. Code Ann. Section 58-40-20)	INC.'S FIRST SET OF
)	DISCOVERY REQUESTS

TO: THE SOUTH CAROLINA COASTAL CONSERVATION LEAGUE, SOUTHERN ALLIANCE FOR CLEAN ENERGY, UPSTATE FOREVER, VOTE SOLAR, THE SOLAR ENERGY INDUSTRIES ASSOCIATION, AND THE NORTH CAROLINA SUSTAINABLE ENERGY ASSOCIATION

Pursuant to S.C. Code Ann. Regs. §§ 103-833 and 103-835, and Rule 36 of the South Carolina Rules of Civil Procedure (“SCRCP”), Dominion Energy South Carolina, Inc. (“DESC”), by and through its undersigned counsel, requests that the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Vote Solar, the Solar Energy Industries Association, and the North Carolina Sustainable Energy Association (collectively, the “Intervenors”) answer the corresponding interrogatories under oath and produce all documents or other materials responsive to the corresponding requests for production (collectively, the “Discovery Requests”) within twenty (20) days of the date of service hereof to the address of the undersigned, set forth below.

INSTRUCTIONS

IT IS HEREIN REQUESTED:

1. That all information, documents, and other materials be provided to the undersigned in the format as requested.

2. That all responses to the below Discovery Requests be labeled using the same numbers as used herein.

3. That if the requested information, documents, or other materials are found in other places or in other exhibits, reference not be made to those, but, instead, that the information, documents, or other materials be reproduced and placed in the responses to the interrogatory or requests for production in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications be directed to the undersigned.

5. Provide copies of the information responsive to each Discovery Request in native electronic working format with all data (including source data) and formulas intact in an unprotected and unlocked form to allow auditing and verification of inputs, methods, and formulas.

6. That each Discovery Request be reproduced at the beginning of the response thereto.

7. That the Intervenor provide the undersigned with responses to the Discovery Requests as soon as possible, but not later than twenty (20) days from the date of service hereof.

8. If the response to any Discovery Request is that the information requested is not currently available, state why the information is not currently available and when the information requested will become available.

9. The Discovery Requests be deemed continuing so as to require the Intervenor to supplement or amend their responses as any additional information, documents, or other materials become available up to and through the date of hearing.

10. If a privilege not to answer is claimed, identify and describe each matter as to which privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

In the event that a claim of privilege is raised pursuant to a common interest, provide the common interest agreement or joint defense agreement upon which the privilege is raised.

11. If a refusal to answer is based upon the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of man hours and costs required to conduct the search.

12. Answer based upon the entire knowledge of the Intervenors, including information in the possession of the Intervenors, their respective officers, members, parents, subsidiaries, directors, consultants, representatives, agents, experts, and attorneys, if any.

13. If any Discovery Request cannot be answered in full, answer to the extent possible and specify the reasons for Your inability to provide a complete answer.

14. Please provide responses to the Requests electronically. To the extent this is impracticable, the responses, including any responsive documents, should be provided at the address of the undersigned, set forth below, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. The term “Docket” shall mean Commission Docket No. 2020-229-E.

2. The term “communication(s)” when used in these Discovery Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

3. The terms “Intervenors,” “You,” and “Your” shall mean the South Carolina Coastal Conservation League, Southern Alliance for Clean Energy, Upstate Forever, Vote Solar, the Solar Energy Industries Association, and the North Carolina Sustainable Energy Association, together with their respective employees, agents, consultants, experts (including Thomas Beach), subsidiaries, affiliates, parent, and other operational or functional units and all officers, directors,

owners, members, employees, agents, and representatives of these entities. The terms also include all other persons acting on behalf of the Intervenors.

4. The term “DESC” shall mean Dominion Energy South Carolina, Inc., formerly South Carolina Electric & Gas Company, together with its employees, agents, consultants, experts, subsidiaries, affiliates, parents, and other operational or functional units and all officers, directors, owners, members, employees, agents, and representatives of these entities. It also includes all other persons acting on behalf of DESC.

5. The terms “document(s)” shall mean all written, recorded or graphic matters whatsoever and all non-identical copies thereof, including but not limited to papers, books, records, letters, photographs, correspondence, communications, electronic mail, text messages, social media records, telegrams, cables, telex messages, evidences of payment, checks, memoranda, notes, notations, work papers, transcripts, minutes, reports, recordings of telephone or other conversations, statements, summaries, opinions, studies, analyses, evaluations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, advertisements, guidelines, charts, manuals, brochures, publications, schedules, price lists, subscription lists, customer lists, journals, statistical reports, desk calendars, appointment books, diaries, lists, tabulations, newsletters, drafts, proofs, galleys, or other prepublication forms of materials, telephone lists or indexes, rolodexes, computer printouts, data processing program libraries, data processing input and outputs, microfilm, microfiches, CD-ROMs, books of account, records or invoices reflecting business operations, all records kept by electronic, photographic, or mechanical means, any notes or drafts relating to any of the foregoing, and any other documents as defined in Rule 34 of the SCRCF of any kind in Your possession, custody or control or to which You have access or

knowledge of its existence. The above list is not meant to be exhaustive but to demonstrate the breadth of the items that may be considered “documents.”

6. The terms “identify” or “identity” used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the time in question. If the person was an officer, director, trustee, commissioner, or employee, also state the job title and areas of responsibility.

7. The terms “identify” or “identity” used with reference to a writing means to state the date, author, type of document (e.g., letter, memorandum, telegram, chart, note, application, etc.), or other means of identification, and its present location or custodian. If any such document is no longer in Your possession or subject to Your control, state what disposition was made of it.

8. The term “Joint Solar Choice Tariff” shall mean the Joint Solar Choice Tariff, as defined on line 20 on page 3 of the Testimony.

9. The term “person” shall mean any individual, partnership, firm, association, corporation, government agency, or other business or legal entity.

10. The terms “relating to,” “relate to,” and “related to” mean directly or indirectly, expressly or implied, mentioning, describing, pertaining to, being connected with, or reflecting upon the subject matter of the specific request.

11. The term “Testimony” means Witness Beach’s direct testimony and exhibits, if any, submitted in this Docket.

12. Please construe “and” as well as “or” either disjunctively or conjunctively as necessary to bring within the scope of these Discovery Requests any information which might otherwise be construed outside their scope.

INTERROGATORIES

1. Identify all documents known to You that were created, referred to, or relied upon in calculating the payback periods for DESC's proposed tariff on page 23 of the Testimony.
2. Describe with detail and specificity the method, including all studies, data, and supporting assumptions (including, but not limited to, system orientation, load profile, generation profile, source of generation profile, kWh/kW, orientation, tilt, and assumed module and inverter configuration), by which you calculated the payback periods for the DESC proposed tariff on page 23 of the Testimony.
3. Describe with detail and specificity the method, including all studies, data, and supporting assumptions (including, but not limited to, system orientation, load profile, generation profile, source of generation profile, kWh/kW, orientation, tilt, and assumed module and inverter configuration), by which you developed Your Joint Solar Choice Tariff.
4. Describe with detail and specificity the assumed inflation rate referenced on line 14 on page 18 of the Testimony.
5. Describe with detail and specificity the basis, including all studies, data, and supporting assumptions, for your statement on lines 9-12 on page 12 of the Testimony which states the Rate 5 TOU rates will "provide a more accurate and cost-based rate."
6. Describe with detail and specificity the value inputs, including underlying studies, data, and supporting assumptions, representing Your quantification of the benefits listed in Table 2 of the Testimony.
7. Identify all documents known to You that were created, referred to, or relied upon in preparing the Demand-side Benefit (+)/Cost(-) Tests described in Table 2 of the Testimony.

8. Describe with detail and specificity the method, including underlying studies, data, and supporting assumptions, by which you calculated the societal benefits underlying the Joint Solar Choice Tariff.

9. Identify all jurisdictions known to You that have adopted a net energy metering tariff containing a similar rate structure as the Joint Solar Choice Tariff.

10. Describe with detail and specificity the definition of “unreasonable cost shift” in line 9 on page 20 of the Testimony.

11. Describe with detail and specificity the measures, including all studies, data, and supporting assumptions, taken by You to determine the specific impacts of the Joint Solar Choice Tariff on low-income customers, including assumed load profiles for low-income customers and supporting documentation.

12. Describe with detail and specificity the rate structures within the Joint Solar Choice Tariff designed to specifically mitigate impacts of the Joint Solar Choice Tariff on low-income customers.

13. Identify all documents known to You that were created, referred to, or relied upon in calculating the payback periods for DESC’s current tariff on page 23 of the Testimony.

14. Describe with detail and specificity the method, including all studies, data, and supporting assumptions (including, but not limited to, system orientation, load profile, generation profile, source of generation profile, kWh/kW, orientation, tilt, and assumed module and inverter configuration), by which you calculated the payback periods for the DESC’s current tariff on page 23 of the Testimony.

15. Identify all documents known to You that were created, referred to, or relied upon in calculating the payback periods for Your Joint Solar Choice Tariff proposal on page 23 of the Testimony.

16. Describe with detail and specificity the method, including all studies, data, and supporting assumptions (including, but not limited to, system orientation, load profile, generation profile, source of generation profile, kWh/kW, orientation, tilt, and assumed module and inverter configuration), by which you calculated the payback periods for Your Joint Solar Choice Tariff proposal on page 23 of the Testimony.

17. Identify all documents known to You that were created, referred to, or relied upon in estimating the bill savings described in Table 6 of the Testimony.

18. Describe with detail and specificity the method, including all studies, data (including assumed hourly load profiles used for very large and small residential customers), and supporting assumptions (including elasticity information for bill savings and installation rates), by which you calculated the residential bill savings in Table 6, Table 7, and Table 8 of the Testimony.

19. Identify all jurisdictions known to You that “keep all excess on-peak kWh that are rolled over to subsequent months as credits only against subsequent on-peak consumption” as You suggest on lines 4-6 on page 4 of the Testimony.

20. Identify all jurisdictions known to You that utilize similar methods to the ones You utilized to calculate transmission and distribution avoided costs in the Testimony.

21. Identify all jurisdictions known to You that apply the hedging costs computation method in calculating costs associated with DERs.

22. Identify all jurisdictions known to You that apply any hedging cost benefits to the value of solar.

23. Identify all jurisdictions known to You that require “all excess off-peak production in a month [to] be credited only against future off-peak usage” as You suggest on lines 4-6 on page 4 of the Testimony.

24. Identify all jurisdictions known to You that require customers to “have access to at least one year of hourly load data from an AMI meter installed on their premises” prior to be placed upon a time-of-use rate in an NEM tariff, as You suggest on lines 21-23 on page 13 of the Testimony.

25. Identify all jurisdictions known to You that require customers “to have granular data on their time-varying energy use over the course of a year” in order to “understand and evaluate such investments,” as you suggest on lines 4-6 on page 10 of the Testimony.

26. Describe with detail and specificity the amount of cost-shift borne by non-net energy metering customers estimated by You to arise under the Joint Solar Choice Tariff presented in the Testimony.

27. Describe with detail and specificity the meaning of the word “economic” as used in the Testimony on lines 15-19 on Page 6 of the Testimony, which says that You “show that the result of this structure is that the only residential solar systems that would be economic are small systems 3 kW or less in size installed by large residential customers, for whom the solar system would serve just 40% or less of their usage.”

28. Describe with detail and specificity the basis, including all studies, data (including from other jurisdictions), and supporting assumptions, for Your statement on lines 13-14 on Page

23 of the Testimony that “simple paybacks of this length (about 10 years) represent a reasonable but not outstanding investment for residential customers.”

29. Describe with detail and specificity the meaning of the word “token” as used in the Testimony on lines 10-11 on Page 26 of the Testimony, which describes a “token rooftop solar PV system.”

30. Describe with detail and specificity the meaning basis for your statement on lines 19-21 on page 6 of the Testimony that “residential customers with lower usage would no longer have an economic opportunity to install solar on their more modest (or more energy efficient) home.”

31. Describe with detail and specificity the meaning of the term “McMansion Rate” as used in the Testimony on line 11 on Page 27 of the Testimony

32. Identify all regulatory bodies known to You that rely upon the Societal Benefits Test when setting rates for net energy metering programs.

33. Identify all regulatory bodies known to You that quantify societal benefits due to solar energy when setting rates for net energy metering programs.

34. Identify all regulatory bodies known to You that quantify the value of public health benefits due to solar energy when setting rates for net energy metering programs.

35. Identify all regulatory bodies known to You that quantify the value of reduced methane leakage due to solar energy when setting rates for net energy metering programs.

36. Identify all regulatory bodies known to You that quantify the value of reduced carbon emissions due to solar energy when setting rates for net energy metering programs.

37. Identify all regulatory bodies known to You that quantify the value of land use benefits due to solar energy when setting rates for net energy metering programs.

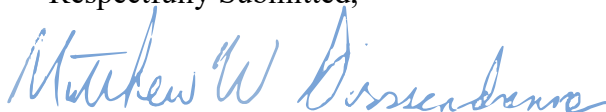
38. Identify all regulatory bodies known to You that have quantified the value of societal benefits in an amount greater than the utility's avoided costs under a net energy metering program.

39. Describe with detail and specificity the way in which "Avoided RPS Compliance" costs were included in the cost-benefit tests outlined in Table 2 of the Testimony.

REQUESTS FOR PRODUCTION

1. Produce all documents identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.
2. Produce all documents, supporting assumptions, and workpapers with formulas and links that support all tables, figures, and graphics in the Testimony.
3. Produce all communications identified, described, relied upon, or referred to in responding to DESC's First Set of Interrogatories served contemporaneously herewith.

Respectfully Submitted,



K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Cayce, South Carolina 29033-3701
Phone: (803) 217-8141
Fax: (803) 217-7810
Email: chad.burgess@dominionenergy.com
matthew.gissendanner@dominionenergy.com

*Attorneys for Dominion Energy South Carolina,
Inc.*

Cayce, South Carolina
This 29th day of January, 2021.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-229-E

Dominion Energy South Carolina, Inc.'s)
Establishment of a Solar Choice Metering Tariff)
Pursuant to S.C. Code Ann. Section 58-40-20)
_____)

**CERTIFICATE OF
SERVICE**

This is to certify that I have caused to be served on this day one (1) copy of **DOMINION ENERGY SOUTH CAROLINA, INC.'S FIRST SET OF DISCOVERY REQUESTS** via electronic mail upon the persons named below, addressed as follows:

Frank Knapp, Jr.
fknapp@knappagency.com

Katherine Lee Mixson
klee@selcsc.org

Jeffrey M. Nelson
jnelson@ors.sc.gov


David L. Neal
dneal@selcsc.org

Jeffrey W. Kuykendall
jwkuykendall@jwklegal.com

R. Taylor Speer
tspeer@turnerpadget.com

Jenny R. Pittman
jpittman@ors.sc.gov

Thadeus B. Culley
thad@votesolar.org



Karen M. Scruggs

This 29th day of January, 2021